UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

May 8, 2002

Reply To
Attn Of: ECL-113

Commander, Ft. Lewis *(sent via e-mail and regular mail)*
Directorate of Public Works
ATTN: AFZH-DEQ MS 17 (Mr. Eric Waehling)
Building 2012, Room 323
Ft. Lewis, WA 98433-9500

Subject: Management Plan Addendum, Landfill 4, dated May 3, 2002

Dear Eric:

Please find EPA's comments on the subject amendment enclosed. Let me know if you have any questions or concerns at (206) 553-1220. Please also feel free to discuss these comments with GF directly such that these concerns can be resolved with no delay to the field effort.

Sincerely,

Sean Sheldrake, Project Manager

Enclosure

cc: Rodney Taie, USACE
Chris Maurer, Ecology

Management Plan Addendum Landfill 4 dated May 3, 2002

Section 1.0. Drinking Water Well Sampling

1. If the QA/QC samples will be shared between two sampling locations, the Camp Bonneville supply wells and the Landfill 4 monitoring wells, then this sampling event should be better defined.

   For example, sharing of QA/QC samples is prudent if the sampling event for both locations occurs on the same day(s); sharing of QA/QC samples is prudent if the samples are all sent to the same laboratory; and sharing of QA/QC samples is prudent if samples from both locations are batched together with QA/QC samples collected at the rate of one QA/QC sample per 20 groundwater samples collected, or once per day, whichever is more.

2. How will it be determined that each of the three production wells to be sampled has been sufficiently purged prior to sample collection?

   The two production wells that are currently in use probably discharge directly into the pressure tanks. The volume of these tanks will have to be considered in estimating a purge volume if the sample cannot be collected closer to the wellhead.

   The production well that is not in use will have to be pumped until several casing volumes of water have been removed and/or the water clears of sediment and/or ferrous oxide debris.

Section 2.0. Chemical Analyses and Comparison to Screening Criteria

1. This section indicates that collected groundwater samples will be sent to two laboratories, how will QA/QC samples be supplied to both laboratories? Please clarify in the text.

   The list of analytes for groundwater analysis should include daughter products or degradates of both TNT and RDX as these analytes may be in higher concentrations in groundwater at the site than their parent compounds due to age of the site. Degradates for RDX include MNX, DNX, and TNX.